

Title V

Model General Permit Template

SERIES 2 GASOLINE TRANSFER - SYSTEMS EQUIPPED WITH PHASE I VAPOR RECOVERY

Template # SJV-GS-2-0

gasoline storage tanks with capacity greater than 250 gallons and
served by a Phase I vapor recovery system

excluding aboveground storage tanks with capacity greater
than 19,800 gallons

not equipped with Phase II vapor recovery system

This template is designed to streamline the Title V permitting process for gasoline transfer and storage facilities meeting the above qualifications. Applicants for Title V permits choosing to use this template will only have to complete the enclosed template qualification form and submit it with their Title V application.

San Joaquin Valley Unified Air Pollution Control District

**Final
Title V Model General Permit Template
Series 1 Gasoline Transfer into Tanks**

Template No: SJV-GS-2-0

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FINAL DECISION DATE:

**SAN JOAQUIN VALLEY
UNIFIED AIR POLLUTION CONTROL DISTRICT**

TITLE V GENERAL PERMIT TEMPLATE SJV-GS-2-0

ENGINEERING EVALUATION

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I. Purpose

The purpose of the proposed template is to streamline the Title V permitting process by identifying the federally applicable requirements for certain gas dispensing facilities and to establish permit conditions which will ensure compliance with such requirements. These conditions will be incorporated into the Title V permit of any facility choosing to make use of the template.

II. Template Applicability

The template applies to gasoline storage and dispensing units which:

have tanks with a storage capacity greater than 250 gallons served by Phase I vapor recovery system, and

are not equipped with Phase II vapor recovery system, and

are not aboveground tanks with a capacity greater than 19,800 gallons.

The applicability of this template is determined by completion of the Template Qualification Form (TQF) attached as Appendix B. The completed and signed TQF must be submitted with the Title V application.

III. Applicable Requirements

Units may be subject to “federally enforceable “ requirements as well as requirements that are enforceable by the “District-only.” Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

District-only requirements used in streamlining of multiple requirements will become federally enforceable. There is no streamlining demonstration in this template and therefore no District-only requirements have been addressed. Table 1, Applicable Requirements, does not necessarily include all federally enforceable requirements that apply to gas dispensing facilities qualifying to use this template, and it is the source’s responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates.

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Table 1. Applicable Requirements

Rule Category	Rule/Regulation	Citation	Description
A	SJVUAPCD Reg. II	2520, 9.1, 9.4.2, 9.5.2, 13.2	Operational, Monitoring and Recordkeeping Requirements, and Permit Shields
A	SJVUAPCD Reg. IV	4621, except section 5.2.2	Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
A	SJVUAPCD Reg. IV	4622, Section 6.1	Transfer of Gasoline into Vehicle Fuel Tanks
A	SJVUAPCD Reg. IV	4623, section 5.4 (formerly 463.2, section IV.D)	Storage of Organic Liquids
B	SJVUAPCD Reg. II	2201	New Source Review Rule
B	SJVUAPCD Reg. II	2520 ¹	Federally Mandated Operating Permits
B	SJVUAPCD Reg. IV	4621, section 5.2.2	Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
B	SJVUAPCD Reg. IV	4622	Transfer of Gasoline into Vehicle Fuel Tanks
C	SJVUAPCD Reg. IV	4403 (formerly 465.3)	Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities
C	SJVUAPCD Reg. IV	4622, except Section 6.1	Transfer of Gasoline into Vehicle Fuel Tanks
C	County Rule	412.1 ²	Organic Liquid Loading
C	County Rule	411.1 ³	Organic Liquid Loading
C	County Rule	411.2 ⁴	Organic Liquid Loading
C	County Rule	412 ⁵	Organic Liquid Loading
C	County Rule	413 ⁶	Organic Liquid Loading
C	County Rule	419 ⁷	Organic Liquid Loading
C	SJVUAPCD Reg. IV	4624	Organic Liquid Loading
C	New Source Performance Stds. Subpart XX	40CFR§60.500	Standards of Performance for Bulk Gasoline Terminals

Category “A” rules contain requirements that are directly applicable to the qualifying units; compliance with these applicable requirements will be demonstrated in this engineering evaluation and assured by the template permit conditions. In section IV, Compliance, the federally enforceable requirements from category “A” rules are listed with a discussion of how compliance with these requirements is achieved.

Category “B” rules contain federally enforceable requirements that were not addressed in this template. These may not be all of the federally enforceable requirements for

¹ Other than Category A requirements

² Kern and Tulare

³ Stanislaus and Merced

⁴ San Joaquin

⁵ Fresno, Kings, Stanislaus, Merced, and San Joaquin

⁶ Kern and Tulare

⁷ Madera

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this unit. Requirements from these rules must be addressed, if applicable, by the applicant outside of this template within the Title V application Compliance Plan form (TVFORM-004). Category “B” listing is included in this table as an informational item to assist applicants in this effort.

Category “C” rules contain requirements which have been determined not to be applicable to qualifying units. A permit shield is proposed for the category “C” rules. An explanation of the determination of non-applicability of Category “C” rules is included in section V, Permit Shield.

IV. Compliance

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

District Rule 2520, 9.1, 9.4.2 and 9.5.2

Section 9.1 requires each permit to include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. To help insure Phase I vapor recovery systems will continue to operate with 95% efficiency, condition #8 prohibits gasoline transfer into any gasoline stationary storage tank subject to this template if the vapor recovery system contains an inoperative dry break.

Section 9.4.2 requires that periodic monitoring be performed if none is associated a federally enforceable requirement to assure compliance. District Rule 4621 does not specify testing or monitoring frequency to show continued compliance with the 95% efficiency requirement for ARB Certified Phase I Vapor Recovery Systems. Therefore, condition #5 requires performance testing to be conducted at specified frequencies and monitoring to be performed.

Section 9.5.2 requires all records be maintained for at least five years. Template permit condition #2 requires that all records be maintained for at least five years.

District Rule 4621

This rule requires that gasoline storage tanks be equipped with an ARB-certified Phase I vapor recovery system. The rule further requires that the vapor recovery system be maintained and operated according to manufacturer’s specifications. No gasoline delivery vessel shall be allowed to operate unless valid state decals are displayed. Aboveground storage tanks must be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank.

Compliance with this rule is assured by permit conditions #4, #6, and #7.

District Rule 4622, Section 6.1

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Compliance with section 6.1 of this rule is required for sources qualifying to use this template since throughput is less than or equal to 24,000 gallons per year and less than or equal to 10,000 gallons in any 30-day period. This section requires recordkeeping and reporting of gasoline throughput under specified conditions for facilities that are exempt from other requirements of this rule. Section 6.1.3 of this section is not applicable to facilities using the throughput exemption and without both Phase I and Phase II vapor recovery systems. Compliance with this rule is assured by permit conditions #1-3.

District Rule 4623, section 5.4

Section 5.4 is the only provision in Rule 4623 which applies equipment covered by this template. Other sections of this rule apply to internal or external floating roof tanks with capacity of 19,800 gallons or more, which are excluded from using this template in the Template Qualification Form. Note also tanks qualifying to use this template have greater than 250 gallons capacity.

Section 5.4 of Rule 4623 reiterates the requirement of District Rule 4621 wherein above-ground gasoline storage tanks with capacity of 19,800 gallons or less must be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank.

Compliance with this rule is assured by permit condition #6.

V. Permit Shield

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based.

A permit shield has been granted from applicable requirements of District Rules 4621, 4622, section 6.1, and 4623, section 5.4, in template permit condition #9.

Permit shields are requested for District Rules 4403 and 4624 and County Rules 412.1 (Kern and Tulare), 411.1 (Stanislaus and Merced), 411.2 (San Joaquin), 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera). Equipment to which these rules are applicable are specifically excluded by template qualification conditions. That is, qualifying units are not units used for light crude oil and gas production, natural gas processing, or organic liquid loading. A permit shield is granted for these rules, and the corresponding county rules referenced above, in template permit conditions #10 and #11.

A permit shield is also requested for Rule 4622, excluding section 6.1 because units qualifying to use this template are existing facilities which dispense less than or equal to

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24,000 gallons per year and less than or equal to 10,000 gallons in any 30-day period. Such facilities are exempt from the provisions of this rule except for Section 6.1, pursuant to section 4.1 of the rule. A permit shield is granted for this rule in template permit condition #11.

District Rule 4623, except section 5.4, applies only to internal or external floating roof tanks with capacity of 19,800 gallons or more, which are excluded from using this template in the Template Qualification Form. Therefore, these requirements are not applicable to any unit using this template. A permit shield is granted from these requirements in template permit condition #11.

A permit shield will be granted for 40 CFR 60 Subpart XX because facilities qualifying to use this template are limited to those which are not bulk gasoline terminals.⁸ A permit shield is granted from this requirement in template permit condition #12.

VI. Permit Conditions

The following conditions will be incorporated into the Title V permit of any facility choosing to make use of template SJV-GS-2-0:

1. Total gasoline throughput for the facility shall not exceed 10,000 gallons per any consecutive 30-day period nor 24,000 gallons per calendar year. [District Rule 4622, 4.1, Exemptions]
2. Records of monthly gasoline throughput shall be maintained, retained on the premises for a period of at least five years and as long as exempt status is claimed. These records shall be made available for District inspection upon request and allow the gasoline throughput for any 30-day period to be continuously determined. [District Rule 2520, 9.5.2 and 4622, 6.1.1]
3. If the gasoline throughput exceeds either 10,000 gallons per any consecutive 30-day period or 24,000 gallons per calendar year, then the facility shall notify the District within 30 days. [District Rule 4622, 6.1.2]
4. Each storage tank subject to this permit shall be equipped with an ARB certified Phase I vapor recovery system, which shall prevent at least 95% by weight of all gasoline vapors displaced during the filling of storage tanks from entering the atmosphere. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with a permanent submerged fill pipe and an ARB certified Phase 1 system, which is maintained and operated according to manufacturers specifications. [District Rule 4621, 3.1 and 5.1.1]

⁸ As defined in 40CFR§60.501 See Appendix A.

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5. Compliance with the requirement of the Phase I system to be 95% effective for displaced vapors is considered to be demonstrated by passing performance tests, at least once every 5 years from the date of the most recent test or at more frequent intervals, as specified by the ARB Executive Order certifying the system. Facilities that have not been performance tested previously, using the following applicable methods, shall be tested in accordance with BAAQMD Source Test Procedure ST-30 (Static Leak Test Procedure—Underground Tanks) or ST-38 (Static Leak Test Procedure—Aboveground Tanks) no later than 90 days of issuance of this permit. [District Rules 2520, 9.4.2]
6. Each aboveground storage tank shall be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank. No gasoline shall be placed, stored, or held in any above-ground tank of 250 gallon capacity or more unless it is so equipped. [District Rule 4621, 5.1.2; 4623, 5.4]
7. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo tank which attest to the vapor integrity of the tank. [District Rule 4621, 5.2.1]
8. No gasoline shall be transferred into any gasoline stationary storage tank subject to this permit if the vapor recovery system contains an inoperative dry break until it is repaired, replaced, or adjusted as necessary to correct the defect. [District Rule 2520, 9.4.2]
9. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4621 except section 5.2.2 (as amended May 20, 1993), 4622, section 6.1 (as amended February 17, 1994), and 4623, section 5.4 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]
10. The requirements of County Rules 412.1 (Kern and Tulare), 411.1 (Stanislaus and Merced), 411.2 (San Joaquin), 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera) do not apply to this permit unit. A permit shield is granted from these requirements. [District Rule 2520, 13.2]
11. The requirements of District Rules 4403 (as amended February 16, 1995), 4622, except section 6.1 (as amended February 17, 1994), 4623, except section 5.4 (as amended December 17, 1992), and 4624 (as amended December 17, 1992) do not apply to this permit unit. A permit shield is granted from these requirements. [District Rule 2520, 13.2]
12. The requirements of 40 CFR 60 Subparts XX do not apply to this permit unit. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

APPENDIX A

DEFINITIONS
FOR
TEMPLATE #SJV-GS-2-0

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ARB Certified Phase I Vapor Recovery System: system designed for control of gasoline vapor emissions displaced during the filling of gasoline storage tanks at refueling stations and certified by the ARB as having 95% control effectiveness. [District Rule 4621, 3.1 and CARB Phase I Executive Orders]

Bulk Gasoline terminal: any gasoline facility which receives gasoline by pipeline, ship or barge, and has a gasoline throughput greater than 75,700 liters per day. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal, State or local law and discoverable by the Administrator and any other person. [40CFR§60.501]

Delivery vessel: any container having a volumetric capacity in excess of 120 gallons that is used for the transportation of gasoline. This term includes pumps, meters, valves, fittings, pipings, and other appurtenances attached to a tank vehicle and used in connection with the gasoline being transported. Cargo tanks used exclusively for aviation gasoline in agricultural operations, with an annual throughput of 1000 gallons or less, will not be considered delivery vessels for the purpose of this rule. [District Rule 4621, 3.2]

Gasoline: any petroleum distillate or petroleum distillate/alcohol blend or alcohol having a TVP of 1.5 psia or greater under actual storage conditions used as a motor fuel. [District Rule 4621, 3.4]

Gasoline bulk plant: any loading facility and associated unloading facilities, storage tanks, and vapor recovery system(s) used to load less than 20,000 gallons in any one (1) day of gasoline to delivery vessels (i.e. tanks trucks or trailers). [District Rule 4621, 3.3]

Gasoline Storage and Dispensing Facility: an aggregate of one or more stationary storage containers, any of which is subject to the provisions of Rule 4621 (Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Plants) and this rule (District Rule 4622) together with dispensers and control equipment required by the rules. [District Rule 4622, 3.3]

Organic Liquid Loading Facility: any aggregate or combination of organic liquid loading and vapor control equipment from the connection at the inlet of the organic liquid pump to and including the nose end connector at the portable delivery trucks and the discharge of the vapor control device(s). [District Rule 4624, 3.8]

APPENDIX B

EPA COMMENTS / DISTRICT RESPONSE
FOR
TEMPLATE # SJV-GS-2-0

Template SJV-GS-2-0

EPA COMMENTS / DISTRICT RESPONSE

The EPA's comments regarding gasoline storage template SJV-GS-2-0 are encapsulated below followed by the District's response. A copy of the EPA's 5/8/97 letter is available at the District. This template is designed for gasoline storage and dispensing systems equipped with CARB certified Phase I vapor recovery but not equipped with Phase II vapor recovery.

General Comments:

1. EPA COMMENT

The second paragraph of section III, Applicable Requirements, refers to streamlining and says this is discussed in section IV. Since neither GS-1-0 or GS-2-0 contains a streamlining demonstration, this reference should be deleted.

DISTRICT RESPONSE

The reference to section IV has been deleted and a comment added that there has been no streamlining in either template.

2. EPA COMMENT

The requirement of District Rule 4621, section 5.1.1, that the vapor recovery system be "maintained and operated according to manufacturer's specification" must be added to both templates, GS-1-0 and GS-2-0.

DISTRICT RESPONSE

This requirement has been incorporated as follows:

Each storage tank subject to this permit shall be equipped with an ARB certified Phase I vapor recovery system, which shall prevent at least 95% by weight of all gasoline vapors displaced during the filling of storage tanks from entering the atmosphere. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with an ARB certified Phase 1 system and maintained and operated according to manufacturers specifications. [District Rule 4621, 3.1 and 5.1.1]

3. EPA COMMENT

The requirements of section 5.2 of District Rule 4621, which apply to delivery vessels, are not specifically excluded by the Template Qualification Form. Since some source owners and operators may also own the delivery vessels that supply the source, the

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District must either include these requirements in the templates, or not shield sources from that provision of the rule.

DISTRICT RESPONSE

District Rule 4621 has three subsections, 5.2.1, 5.2.2 and 5.2.3. The requirements of subsection 5.2.1 have been added as follows:

No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo tank which attest to the vapor integrity of the tank. [District Rule 4621, 5.2.1]

Subsection 5.2.2 prohibits operation of a gasoline delivery vessel unless it is vapor tight and addresses delivery vessel loading requirements. Sources using this template may or may not own or operated gasoline delivery vessels and therefore this requirement may or may not be applicable to them. The District does not wish to restrict the use of this template nor do we wish to add additional requirements to the template which are not applicable to many of the sources. Therefore subsection 5.2.2 will not be shielded and template users will be required to address this subsection in their source specific application for the unit. Section III, Table 1, Applicable Requirements, has been amended accordingly.

Subsection 5.2.3 is no longer applicable to any facility since the section 4.2 exemption referenced expired on December 1, 1993.

4. EPA COMMENT

The District grants permit shields from District Rule 4624 and 4403 in templates GS-1-0 and GS-2-0, but does not address future applicability of these rules to the sources. Conditions must be added to ensure that an operational change at the source does not trigger the rule.

DISTRICT RESPONSE

The applicability of the referenced permit shields has been restricted to apply to the permit unit and not to the entire source. Units qualifying to use this template will not trigger applicability of District Rules 4624 and 4403 without significant modification, which would require an Authority to Construct and new Operating Permit. Non-applicability of these rules is discussed in section V, Permit Shield.

5. EPA COMMENT

The compliance certification language in the Template Qualification Forms of templates GS-1-0 and GS-2-0 must be made consistent with part 70 requirements.

DISTRICT RESPONSE

The compliance certification language in the Template Qualification Forms of templates GS-1-0 and GS-2-0 has been amended to be consistent with part 70 requirements.

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Template Specific Comments:

6. EPA COMMENT

The last paragraph in section III, Applicable Requirements refers to category “D” rules. This reference should be deleted since there are no category “D” rule in the Table of Applicable Requirements..

DISTRICT RESPONSE

This reference to category “D” rules has been deleted since none apply to this template from the template and to be consistent with template GS-1-0.

7. EPA COMMENT

It would be useful if Appendix A, Definitions, included the definition of ARB Certified Phase I Vapor Recovery System.

DISTRICT RESPONSE

The definition of ARB Certified Phase I Vapor Recovery System has been added to Appendix A.

8. EPA COMMENT

In the third question on the Template Qualification Form (TQF), the District should change the word “any” to “every” to clarify that the throughput limit must be met in every 30-day period.

Also, there is an error in the District’s instructions after this question. If the source answers “yes”, it must continue to the next question.

DISTRICT RESPONSE

The District believes the current condition language is clear. In addition this is consistent with the language contained in section 4.1.2 of District Rule 4622. Therefore no change has been made to this TQF question.

The instructions following this question have been amended to read, “If “yes,” continue to the next question; otherwise STOP - you cannot use this template.”

Comments on Specific Template Conditions:

9. EPA COMMENT

Condition 1 lack a citation of origin and authority. The citation must be included pursuant to Part 70 requirements.

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DISTRICT RESPONSE

The citation of origin and authority for condition 1 has been added as follows:

Total gasoline throughput for the facility shall not exceed 10,000 gallons per any consecutive 30-day period nor 24,000 gallons per calendar year.
[District Rule 4622, 4.1, Exemptions]

10. EPA COMMENT

District Rule 4622, section 6.1.1 requires sources to “maintain gasoline throughput records which will allow the gasoline throughput of any 30-day permit to be continuously determined.” Condition 2 does not contain the entire requirement and the permit may not relax the recordkeeping requirements of section 6.1.1.

DISTRICT RESPONSE

This condition has been amended as follows:

Records of monthly gasoline throughput shall be maintained, retained on the premises for a period of five years and as long as exempt status is claimed. These records shall be made available for District inspection upon request and allow the gasoline throughput for any 30-day period to be continuously determined. [District Rule 2520, 9.5.2 and 4622, 6.1.1]

11. EPA COMMENT

The District may want to include section 3.1 in its citation in condition 3.

DISTRICT RESPONSE

The citation for condition #3 (now condition #4) has been amended to include section 3.1 of District Rule 4621, which contains the definition of ARB Certified Phase I Vapor Recovery System.

12. EPA COMMENT

The template lacks conditions that assure compliance with the 95% requirement of condition 3. The District must add the performance testing requirements of rule 4621, section 6.2, to demonstrate compliance.

Also, periodic monitoring should be added to insure the vapor recovery system is operating correctly. The requirement for sources subject to the series I template, which prevents gasoline transfer if certain defects are present, would be sufficient.

DISTRICT RESPONSE

The performance test method required by District Rule 4621, section 6.2, is ARB Method 202. This method is a certification procedure for gasoline bulk plants (where delivery vessels are being loaded with gasoline) and is not applicable to units qualifying to use this template, which are gasoline storage tanks used at gasoline dispensing

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facilities (where storage tanks are being filled by gasoline delivery vessels for later transfer to end user).

After numerous discussions with EPA regarding appropriate periodic monitoring, the following changes have been made to the template with verbal approval from EPA:

1. For underground gasoline storage tanks, a condition will be added requiring performance testing at least every 5 years, using ST-30, Static Leak Test Procedure for underground tanks. This will help to assure vapor integrity of the storage tank and ability of the Phase I system to achieve 95% efficiency during filling by a delivery vessel displaying state certification decals. This procedure will also detect an inoperative pressure/vacuum relief valve.
2. For aboveground tanks a condition will be added requiring performance testing at least every 5 years, using ST-38, Static Leak Test Procedure for aboveground tanks. This will help to assure vapor integrity of the storage tank and ability of the Phase I system to achieve 95% efficiency during filling by a delivery vessel displaying state certification decals.

With regards to EPA's request to add a requirements prohibiting gasoline transfer if certain defects from series I template are present, the majority of these defects are in the Phase II vapor recovery system and therefore not applicable to units qualifying to use this template. Two specific defects are applicable to the Phase I system. These are pressure/vacuum relief valves (may not be detected during day-to day operation) and dry breaks (will be detected in day-to-day operation) which are inoperative. A condition will be added to prohibit gasoline transfer if an inoperative dry break is detected until the problem is identified and corrected.

13. EPA COMMENT

The requirement from District Rule 4621, section 5.1.1, that stationary source containers be equipped with a "permanent submerged fill pipe", must be added to the template's conditions.

DISTRICT RESPONSE

Condition #4 has been amended as follows to incorporate this requirement:

Each storage tank subject to this permit shall be equipped with an ARB certified Phase I vapor recovery system, which shall prevent at least 95% by weight of all gasoline vapors displaced during the filling of storage tanks from entering the atmosphere. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with a permanent submerged fill pipe and an ARB certified Phase 1

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system, which is maintained and operated according to manufacturers specifications. [District Rule 4621, 3.1 and 5.1.1]

14. EPA COMMENT

If a permit shield is to be granted for District Rule 4622, section 6.1 for Recordkeeping and Reporting, the District must address all of the requirements of this section in the conditions. Section 6.1.2 requires sources to notify the District within 30 days if their throughput levels exceed the exemption levels of section 4.1. Section 6.1.3 specifies the minimum content of records of testing required in section 6.3.

DISTRICT RESPONSE

A condition has been added addressing requirements of District Rule 4622, section 6.1.2, as follows:

- If the gasoline throughput exceeds either 10,000 gallons per any consecutive 30-day period or 24,000 gallons per calendar year, then the facility shall notify the District within 30 days. [District Rule 4622, 6.1.2]

Regarding requirements of Section 6.1.3, the District has never interpreted this section as being applicable to Phase I only systems for which this template was created. Section 6.1.3 is applicable to systems with Phase I and Phase II which are also subject to sections 6.2 (Testing) and 6.3 (Test Methods) requirements. Units qualifying to use this template are exempt to District Rule 4622, except for section 6.1 (Recordkeeping and Reporting), and are not required by the rule to perform testing. Therefore requirements of 6.1.3 to maintain records of tests required by sections 6.2 and 6.3 are not applicable to operators of units utilizing this template. District Rule 4622 is currently being revised to clarify this interpretation.

APPENDIX C

TEMPLATE QUALIFICATION FORM FOR TEMPLATE #SJV-GS-2-0

Template SJV-GS-2-0

Title V General Permit Template Qualification Form

District permit # _____

Please answer the questions in the table below. A gasoline transfer facility (unit) which meets the criteria of this table is qualified to use this template as part of a Title V application. To use this template, remove this sheet and attach to application.

Yes	No	Description of Qualifying Units
		Is the unit equipped with an ARB certified Phase I vapor recovery system? [District Rule 4621, 3.1, 5.11] If "yes," continue to the next question; otherwise STOP - you cannot use this template.
		Since May 21, 1992, has the unit ever been equipped with an ARB certified Phase II vapor recovery system? [District Rule 4622, 5.3] If "no," continue to the next question; otherwise STOP - you cannot use this template.,
		Has the unit been in existence since November 18, 1992 and has the aggregate facility throughput remained less than or equal to 24,000 gallons per calendar year and less than or equal to 10,000 gallons in any consecutive 30-day period? [District Rule 4622, 4.0] If "yes," continue to the next question; otherwise STOP - you cannot use this template.
		Does the facility serve to store gasoline (see Appendix A) in a stationary storage container with a capacity greater than 250 gallons? [District Rule 4621, 5.1.1] If "yes," continue to the next question; otherwise STOP - you cannot use this template.
		Is the unit an internal or external floating roof tank with capacity of 19,800 gallons or more? [District Rule 4623, 5.1, 5.2] If "no," continue to the next question, otherwise STOP - you cannot use this template.
		Is the unit used for transfer of gasoline into a delivery vessel or for loading at a gasoline bulk plant (see Appendix A)? [District Rule 4621, 2.0, 3.2, 3.3] If "no," continue to the next question, otherwise STOP - you cannot use this template.
		Is the unit a component serving light crude oil or gases at a light crude oil and gas production facility, or a component serving natural gas processing? [District Rule 4403, 2.0] If "no," continue to the next question, otherwise STOP - you cannot use this template.
		Is the unit used for organic liquid loading (see Appendix A, for organic liquid loading facility)? [District Rule 4624, 2.0, 3.8] If "no," continue to the next question, otherwise STOP - you cannot use this template.
		Is the unit associated with loading at a bulk gasoline terminal (see Appendix A)? [40CFR§60.501] If "no," you may use this template.

Based on information and belief formed after reasonable inquiry: 1) the information on this form is true, accurate, and complete, and 2) the facility is in compliance with this template's permit conditions:

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Signature of Responsible Official

Date

Name of Responsible Official (Please print)